

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE

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Case No. 15- 72195

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CHELSEA CAPITAL PARTNERS, LLC, *

Chapter 11

*

Debtor.

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**APPLICATION TO APPROVE
EMPLOYMENT OF ATTORNEYS**

COMES NOW Chelsea Capital Partners, LLC, Debtor and Debtor-in-Possession, and files this Application to Approve Employment of Attorneys pursuant to 11 U.S.C. §327 and in support thereof, respectfully represents:

1. On November 18, 2015, Debtor filed a petition constituting an order for relief under 11 U.S.C. Chapter 11.

2. Debtor has continued in possession of his property and continues to operate as Debtor-in-Possession pursuant to 11 U.S.C. §§ 1107 and 1108.

3. Debtor wishes to employ the law firm of Macey, Wilensky & Hennings, LLC, ("Macey, Wilensky") as its attorneys.

4. Debtor has selected Macey, Wilensky for the firm's experience and qualifications as Debtor's counsel in commercial bankruptcy cases.

5. The professional services said attorneys are to render include:

(a) Giving Debtor legal advice with respect to its powers and duties as Debtor-in-Possession in the management of its property;

(b) Preparing on behalf of Debtor as Debtor-in-Possession necessary schedules, applications, motions, answers, orders, reports and other legal matters;

(c) Assisting in examination of the claims of creditors;

(d) Assisting with formulation and preparation of the disclosure statement and plan of reorganization and with the confirmation and consummation thereof; and

(e) Performing all other legal services for Debtor as Debtor-in-Possession which may be necessary herein.

6. To the best of Debtor's knowledge, Macey, Wilensky has no connection with the creditors, or any other party-in-interest, or their respective attorneys.

7. The terms of employment of said law firm agreed to by the Debtor-in-Possession, subject to the approval of the Court, are that certain attorneys and other personnel within said firm will undertake this representation at their standard hourly rates:

<u>Attorney</u>	<u>Standard Hourly Rate</u>
Frank B. Wilensky	\$450.00
Todd E. Hennings	\$425.00
William A. Rountree	\$350.00
Todd H. Surden	\$240.00
<u>Paralegal</u>	<u>Standard Hourly Rate</u>
Sandra H. McConnell	\$120.00

K. Mike Furlong \$120.00

Sharon Wenger \$120.00

The standard hourly rates charged by Macey, Wilensky's attorneys and paralegals are subject to change in the future. Macey, Wilensky will make periodic application for interim compensation, and if, at the completion of the case the results merit it, the attorneys may make application to the Court for the allowance of a premium above their hourly rates.

Pursuant to 11 U.S.C. § 331, a debtor's attorney may apply to the court not more than once every 120 days after an order for relief in a case under this title, or more often if the court permits. Macey, Wilensky seeks the Court's permission to apply for compensation every 90 days.

8. The Debtor, Surrey Capital, LLC, paid a retainer of \$13,731.00 plus court filing fee of \$1,717.00 for a total amount of \$15,448.00 to Macey, Wilensky on or about November ___, 2015. This retainer is intended to be a security retainer and not a general retainer. Macey, Wilensky maintains a security interest in the funds under applicable law.

9. The Debtor has an immediate need for counsel, and will suffer irreparable harm if Macey, Wilensky is not employed without delay. F.R.Bankr.P. 6003. The Debtor requires the advice of counsel concerning the preparation of its schedule of debt and statement of financial affairs, and needs counsel present to comply with the U.S. Trustee's requests for an initial debtor interview and preparation of documents requested by the U.S. Trustee's Office.

10. Macey, Wilensky represent no interest adverse to Debtor as Debtor-in-Possession or the estate in the matters upon which it is to be engaged for the Debtor-in-Possession, and its employment would be to the best interest of this estate.

WHEREFORE, Debtor prays that its employment of the said Macey, Wilensky & Hennings, LLC, as counsel under the terms specified to represent it as Debtor-in-Possession in this case under Chapter 11 of the Bankruptcy Code be approved by the Court subject to objection filed by the United States Trustee or any creditor on or before twenty-one (21) days from the date any Order granting this Application is entered, and that it have such other and further relief as is just.

CHELSEA CAPITAL PARTNERS, LLC

By: _____

R. C. Patel
Manager

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